

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PRACTICEWORKS, INC., et al.,) Civil No.: JFM 02 CV 1205
)
Plaintiffs)
V.)
)
PROFESSIONAL SOFTWARE)
SOLUTIONS OF ILLINOIS, INC.,)
Defendant.)
)
AND)
)
PRACTICEWORKS, INC., et al.,) Civil No.: JFM 02 CV 1206
)
Plaintiffs)
V.)
)
DENTAL MEDICAL AUTOMATION, INC.,)
)
Defendant.)

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

Defendants, PROFESSION SOFTWARE SOLUTIONS OF ILLINOIS, INC. AND DENTAL MEDICAL AUTOMATION, INC. by their attorney, Law Offices of Mark E. Wiemelt, P.C., requests pursuant to Fed. R. Civ. P. 34, , and serves the requests for production of documents set forth below upon Plaintiffs, PRACTICEWORKS, INC., et al to be answered fully under oath.

These requests for production are continuing. If either defendant acquires additional knowledge, information, or documents responsive to any of these interrogatories or requests for production after service of its responses, defendants shall serve a supplemental answer to such interrogatory or provide the additional documents within 15 days after such additional knowledge, information, or documentation is acquired.

1. Any and all sales documents, including but not limited to order forms, purchase orders, purchase order acknowledgements and shipping documents for each delivery of SoftDent product ever disseminated by Plaintiffs or their predecessors.
2. Any and all documents describing procedures for the dissemination of SoftDent product.
3. End-user registration forms for any and all SoftDent product disseminated by Plaintiffs or their predecessors.
4. Any and all product registration forms for every SoftDent product shipped by Plaintiffs or their predecessors.
5. Any and all shipping documents or other documents regarding the shipment of SoftDent to End-users.
6. Any and all documents regarding SoftDent product shipping procedures.
7. Plaintiffs customer database for all periods of the time during which the Agreements with Defendants were in effect.
8. Copies of any and all Dealer Agreements entered into with Dealers other than Defendants.
9. Any and all documents that expressly provide that SoftDent product, whether sold or given free of charge to Defendants, was furnished pursuant to the terms of the Agreements, i.e., that it either would be re-sold by Defendants to genuine end-users or used by Defendants as value-added resellers.
10. The names and addresses of any and all Network Solution Providers that have entered into agreements with Plaintiffs.

11. The name, address, and contact person for each and every educational institution to which Plaintiffs or their predecessors sold SoftDent product.
12. Each and every document that evidences the SoftDent product containing trade secrets, including but not limited to written procedures for protecting trade secrets.

All documents being produced shall be served on Plaintiff's attorneys at 10 South LaSalle St., Suite 3300, Chicago, Illinois, 60603.

Respectfully submitted this ____ day of June, 2004

DENTAL MEDICAL AUTOMATION, INC. AND
PROFESSIONAL SOFTWARE SOLUTIONS OF
ILLINOIS, INC.

Dated: _____, 2004 By:

One of Their Attorneys

Lead Counsel (Pro Hac Vice):

Mark E. Wiemelt (06208213)
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VERIFICATION

I, _____, having been first duly sworn, hereby certify that all responsive documents in the care custody, control or access of Plaintiffs have been produced.

Plaintiffs

By: _____

Title: _____